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**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

**CARNELLA TIMES and ERVING SMITH, on
behalf of themselves and all others similarly
situated, and THE FORTUNE SOCIETY, INC.,**

Plaintiffs,

v.

TARGET CORPORATION,

Defendant.

No. 18 Civ. 2993

NOTICE OF MOTION FOR APPROVAL OF ATTORNEYS' FEES AND COSTS

For the reasons set forth in Plaintiffs' Memorandum of Law in Support of Plaintiffs' Motion for Approval of Attorneys' Fees and Costs, and in the Declarations of Ossai Miazad, Coty Montag, and Lisa Levy in Support of Plaintiffs' Motions for Certification of the Settlement Class and Final Approval of Class Action Settlement, Approval of Attorneys' Fees and Costs, and Approval of Service Award, and the supporting exhibits attached thereto, Plaintiffs respectfully request that the Court enter an Order awarding Class Counsel attorneys' fees and costs in the amount of \$1,900,000.00.

Dated: October 9, 2019
New York, New York

Respectfully submitted,

By: /s/ Ossai Miazad

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Attorneys for Plaintiffs and the Settlement Class

CERTIFICATION OF SERVICE

I hereby certify that on **October 9, 2019**, a copy of the foregoing document was filed electronically and service made by certified mail to anyone unable to accept electronic filing. Notice of this filing will be sent by email to all parties by operation of the Court's electronic filing system or by certified mail for anyone unable to accept electronic filing. Parties may access this filing through the Court's system.

/s/ Ossai Miazad
Ossai Miazad